

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

TRACI ST. CLAIRE)	
)	
Plaintiff,)	CIVIL ACTION FILE
)	
v.)	NO. 1:17-cv-03370-AT-JFK
)	
DITECH FINANCIAL, LLC,)	
f/k/a GREEN TREE SERVICING, LLC)	
)	
Defendant.)	

SECOND CONSENT MOTION FOR EXTENSION OF TIME

COME NOW Plaintiff and Defendant Ditech Financial, LLC f/k/a Green Tree Servicing, LLC (“Ditech”), by and through their undersigned counsel, pursuant to Fed. R. Civ. P. 6(b)(1) and Local Civil Rule 7.4, jointly submit this Consent Motion for an extension of time to and including December 18, 2017, within which Ditech is to file their answer or otherwise respond to Plaintiff’s Complaint for Damages. In support thereof, Ditech states as follows:

The Parties are engaging in comprehensive settlement discussions and working towards an early resolution of this matter. In order to foster the current settlement negotiations, Ditech requests additional time to answer or otherwise respond to Plaintiff’s Complaint, up to and including December 18, 2017. Counsel for Plaintiff is agreeable to the requested extension. This is the second request for

an extension of time to respond to the Complaint, and this request is not being made for purposes of delay or any other improper reason.

WHEREFORE, Defendant Ditech hereby requests that the Court enter an Order: (1) granting this Second Consent Motion for an Extension of Time; and (2) providing Ditech with an extension of time to file its answer until on or before December 18, 2017. A proposed order is attached as **Exhibit A** hereto for the Court's consideration.

Respectfully submitted, this 28th day of November, 2017.

Prepared and Consented to by:

/s/ Mark J. Windham

Mark J. Windham

Georgia Bar No. 113194

Monika V. Scott

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Consented to by:

/s/ James W. Hurt

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Counsel for Plaintiff

CERTIFICATE OF SERVICE

I certify that I electronically filed the foregoing *Second Consent Motion for Extension of Time* with the Clerk of the Court using the CM/ECF System which will then send a notification of such filing (NEF) to the following:

James W. Hurt, Esq.
HURT STOLZ, P.C.
345 West Hancock Ave.
Athens, Georgia 30601
Counsel for Plaintiff

This 28th day of November, 2017.

/s/ Mark J. Windham

Mark J. Windham
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